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May 23, 2005

By Messenger

Kathleen J. Hill, Esq. Law Office of Kathleen J. Hill 92 State Street, Suite 700 Boston, MA 02109

> Re: <u>Griffith v. OneBeacon Insurance Company, et. al.</u> U.S.D.C. Massachusetts, Docket No. 03-CV-12573-EFH

Dear Kathleen:

Enclosed please find the following:

- Defendants' First Supplemental Response to Plaintiff's First Request for Production of Documents;
- 2. Defendants' Third Supplemental Response to Plaintiff's Request for Production of Documents Styled as a Subpoena *Duces Tecum*;
- Defendant OneBeacon Insurance Company's First Supplemental Answer to Plaintiff's First Set of Interrogatories;
- Defendant OneBeacon America Insurance Company's First Supplemental Answer to Plaintiff's First Set of Interrogatories; and
- Bate stamped documents DEF 0292 through DEF1349.

In an effort to expediently comply with the Court's Order, Defendants have produced Bates stamped documents numbers DEF 0887 through DEF 1349 which contain some confidential employee information with the understanding that such information will be subject to and retroactively incorporated in the upcoming confidentiality agreement Defendants require before production of additional employee data. Should you be unwilling to agree to these terms, please return all of the documents without making photo copies before 11:00 am on Monday, May 23, 2005. Defendants will then reproduce these documents after the confidentiality agreement has been executed and approved by the Court.

MORGAN, BROWN & JOY LLP

Kathleen J. Hill May 20, 2005 Page 2

Should you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

Leah M. Moore

enclosures

Joan K. Geddes, Esq. (via first class mail w/ written portion only) cc:

Keith B. Muntyan, Esq. (w/o encls.)